

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION
TO DEFENDANTS' MOTION FOR CONTINUANCE**

Samsung's motion for continuance (D.I. 372) seeks to postpone trial by at least ten weeks but offers no sufficient basis for such a prejudicial extension. The motion should be denied.

While the motion discusses specific conflicts Samsung has with beginning trial on August 16, 2024, the motion provides no such information to support Samsung's proposed continuance to October 28, 2024. Nor did Samsung provide such information in the meet-and-confer process. Samsung identifies an ITC trial that concludes on August 19 but no other specific conflicts during this ten-week period. Instead, Samsung merely states that its counsel and witnesses are available the week of October 28—ten weeks after the current trial date and nearly three months after the parties' original trial date. This provides no information about what conflicts, if any, warrant such a long continuance.

With numerous available trial weeks between August 16 and October 28, there is no reason for the proposed ten-week continuance. Accordingly, Headwater respectfully opposes Samsung's request to postpone trial to the week of October 28.

Dated: July 19, 2024

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,
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CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a).

/s/ Marc Fenster

Marc Fenster